

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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EVERYTOWN FOR GUN SAFETY SUPPORT
FUND, THE CITY OF KANSAS CITY,
MISSOURI and THE STATE OF ILLINOIS

Civil Action No. 1:20-cv-00376

Plaintiff,

v.

BUREAU OF ALCOHOL, TOBACCO,
FIREARMS AND EXPLOSIVES
and MARVIN RICHARDSON,
in his official capacity as ACTING
DIRECTOR of Bureau of Alcohol, Tobacco,
Firearms and Explosives,

Defendants.
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AMENDED CERTIFICATION OF ADMINISTRATIVE RECORD

I, Megan A. Bennett, pursuant to 28 U.S.C. § 1746, do declare and state as follows:

Currently I am the Deputy Assistant Director, Industry Operations, Field Operations Directorate, Bureau of Alcohol, Tobacco, Firearms, and Explosives. Industry Operations is responsible for the enforcement of the ATF regulatory mission. Among other things, IO is responsible for licensing persons engaging in a firearm or explosive business and conducting inspections to ensure that licensees are in compliance with all applicable regulations.

The information in this certification is based upon my personal knowledge or on information provided to me in the course of my official duties. The materials listed in the index below and attached hereto constitute, to the best of my knowledge, a true and complete copy of the administrative record in the above-referenced civil action. The Administrative Record also includes the Declaration of Industry Operations Investigator Jonathan Han. This declaration is

intended to provide further factual information, not reflected in the referenced documents, regarding the investigation conducted in connection with the application of JA Industries LLC for a Federal firearms license.

INDEX TO THE ADMINISTRATIVE RECORD

1. 2004 Jimenez Arms Application
2. 2005 Jimenez Arms Original Inspection
3. 2005 Jimenez Amended Application
4. 2005 Jimenez Arms letter from Jimenez attorney regarding application approval delay
5. 2005 Jimenez Arms Inc. Application
6. 2005 LAFD emails re: Jimenez Arms Inc. Application
7. 2005 Jimenez Arms Application Inspection
8. 2005 Jimenez Arms Amended Application Inspection
9. 2007 Jimenez Arms Inc. Amended Application Inspection re: new location inspection
10. 2008 Jimenez Arms letter re: sale of shares
11. 2008 Jimenez Arms Inc. Theft/Loss Report
12. 2009 Jimenez Arms Inc. Inspection
13. 2010 Jimenez Arms Inc. Special Request
14. 2010-04-05 Jimenez Arms Inc. Theft/Loss Report
15. 2010-07-14 Jimenez Arms Inc. Theft/Loss Report
16. 2011 KCFD Law Enforcement Inquiry of Jimenez Arms
17. 2012 Jimenez Arms Inc. Inspection
18. 2014 Jimenez Arms Inc. Recall Inspection
19. 2017 Jimenez Arms Inc. Inspection

20. 2019 Jimenez Arms Inc. Amended Application re: new location inspection
21. 2020-04-17 JA Industries LLC Authorization Letter
22. JA Industries LLC Nevada business license
23. JA Industries LLC Operating Agreement
24. 2015-03-30 JA Industries LLC Articles of Organization
25. JA Industries LLC EIN IRS
26. 2020 JA Industries LLC Initial Application
27. 2020 JA Industries LLC Final Application
28. JA Industries LLC FFL
29. JA Industries LLC signed FFL regulations
30. JA Industries LLC Clark County Assessor Business Premise Owner Info
31. JA Industries LLC Business Information
32. JA Industries LLC Spartan Notification
33. 2020-04-27 JA Industries LLC Inspection
34. 2015 Kimberly Jennings emails
35. Genske email re: Bradley Jennings shares
36. ATF Order 5370.1D Federal Firearms Administrative Action Policy and Procedures
37. Chapter B, Industry Operations Manual
38. Indicators of Hidden Ownership
39. Everytown Letter to SAC, San Francisco FD dated July 8, 2020
40. Federal Firearms Licensing Center, Standard Operating Procedures, Chapter 4 date September 2018 with exhibits
41. Email chain with attachments dated March 25, 2020 re: Background Check
42. Email chain with attachments dated March 26, 2020 8:05 PM re: Background Check

43. Email chain dated March 26, 2020 11:19 AM
44. Email with attachments dated March 26, 2020 re: JA Inc Open Inventory
45. Email with attachments dated March 27, 2020 re: Discontinuance Form
46. Email with attachments dated March 27, 2020 re: for your review sista!
47. Email chain with attachments dated March 27, 2020 re: FW: Industry Operations Report of Suspicious Activity (SUS-2328)
48. Email chain with attachments dated March 27, 2020 8:06 PM re: FW: Industry Operations Report of Suspicious Activity (SUS-2328)
49. Email chain dated August 11, 2020 re: FW: Industry Operations Report of Suspicious Activity (SUS-2328)
50. Email with attachments dated April 1, 2020 re: Licensing Center Update: 9-88-00873
51. Email chain dated April 1, 2020 4:07 PM re: Licensing Center Update: 9-88-00873
52. Email with attachments dated April 9, 2020 re: FW: New App JA INDUSTRIES LLC 9-88-06010
53. Email dated April 14, 2020 re: Jimenez How To Trace Guide
54. Email dated April 16, 2020, re: FFL application supporting docs
55. Email chain with attachments dated April 16, 2020 8:28 PM re: FFL application supporting docs
56. Email with attachments dated April 17, 2020 re: Fw: Letter of Authorization
57. Email chain with attachments dated April 22, 2020 1:31 PM re: FFL application supporting docs
58. Email chain with attachments dated April 22, 2020 1:34 PM re: FFL application supporting docs
59. Email with attachments dated April 27, 2020 re: Spartan Notification RE: 9-88-06010
60. Email dated April 27, 2020 re: FW: Spartan Notification RE: 9-88-06010 Inspection Results
61. Email with attachments dated April 27, 2020 re: Corrected app JA Industries LCL

- 62. Printout from the National Licensing Center, showing a background check resulting in
“cleared”
- 63. Email dated July 27, 2021 re: FW: Refrain from going to the office
- 64. Declaration of Jonathan Han dated July 30, 2021
- 65. Unredacted pages from Chapter B, Industry Operation Manual (formerly ATF 0726-0727)

I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 2nd day of August 2021.

Megan A. Bennett
Deputy Assistant Director
Industry Operations
Bureau of Alcohol, Tobacco, Firearms and
Explosives